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August 20, 2008

**Via Facsimile: 312-364-1003**

Martin McManaman  
Lowis & Gellen, LLP  
200 West Adams, Suite 1900  
Chicago, Illinois 60606

**Re: Douglas Nash v. County of Will, et. al.  
Case No.: 08-C-1170**

Dear Mr. McManaman:

I am writing regarding my letter dated August 11, 2008, addressing various deficiencies with your clients' discovery responses. As stated in my letter, I had requested that you revise your discovery responses to fully comply with our interrogatories and production requests and tender your revised responses by August 18, 2008. To date, I have not received any additional materials from you. I have attempted to contact you regarding these issues several times via phone and e-mail, and again have not heard from you.


This letter is to confirm, per my voice mail to you this afternoon, that if we do not hear from you and receive complete responses to our discovery responses by noon tomorrow, August 21, 2008, we will have no choice but to file a motion to compel. As you are aware, it is anticipated that fact discovery in this case will be lengthy and extensive, and the fact discovery closure date is looming. We have been more than reasonable in accommodating you through the written discovery process by giving you extensions to tender your answers which were due at the end of May 2008. As a result of these extensions, several of which you did not fully honor, your answers were months overdue. I cannot go forward with Defendants' depositions tentatively scheduled for the weeks of September 8 and 15 if these written discovery issues are not fully resolved. Additionally, you have not contacted me regarding the proposed dates I have suggested to



you for your clients' depositions, and I cannot continue to keep my schedule open for these as I need to schedule depositions in other cases.

Please contact me as soon as possible. I look forward to hearing from you soon.

Respectfully yours,

A handwritten signature in dark ink, appearing to read "Ronak Patel". The signature is written in a cursive, flowing style.

Ronak Patel

TRANSMISSION VERIFICATION REPORT

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